

1 JOSHUA M. DICKEY  
 2 Nevada Bar No. 6621  
 3 PAUL C. WILLIAMS  
 4 Nevada Bar No. 12524  
 5 REBECCA L. CROOKER  
 6 Nevada Bar No. 15202  
 7 **BAILEY♦KENNEDY**  
 8 8984 Spanish Ridge Avenue  
 9 Las Vegas, Nevada 89148-1302  
 Telephone: 702.562.8820  
 Facsimile: 702.562.8821  
 JDickey@BaileyKennedy.com  
 PWilliams@BaileyKennedy.com  
 RCrooker@BaileyKennedy.com

8 *Attorneys for Plaintiffs*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 SUNRISE HOSPITAL AND MEDICAL CENTER,  
 13 LLC; SUNRISE MOUNTAINVIEW HOSPITAL,  
 14 INC.; and SOUTHERN HILLS MEDICAL  
 15 CENTER, LLC,

16 Plaintiffs,

17 vs.

18 BLUE CROSS OF CALIFORNIA D/B/A ANTHEM  
 19 BLUE CROSS; ANTHEM BLUE CROSS LIFE AND  
 HEALTH INSURANCE COMPANY; and KEENAN &  
 ASSOCIATES, INC.,

20 Defendants.

21 Case No. 2:23-cv-01986-APG-EJY

**22 STIPULATION AND ORDER TO EXTEND  
 23 PLAINTIFFS' TIME TO RESPOND TO  
 24 THE ANTHEM DEFENDANTS' MOTION  
 25 TO DISMISS PLAINTIFFS' FIRST  
 AMENDED COMPLAINT AND  
 MEMORANDUM OF POINTS AND  
 AUTHORITIES IN SUPPORT  
 (ECF No. 37)  
 (SECOND REQUEST)**

22 Plaintiffs Sunrise Hospital and Medical Center, LLC; Sunrise Mountainview Hospital, Inc.;  
 23 and Southern Hills Medical Center, LLC ("the Hospitals") and Defendants Blue Cross of California  
 24 d/b/a Anthem Blue Cross and Anthem Blue Cross Life and Health Insurance Company (collectively,  
 25 the "Anthem Defendants") (collectively, the "Parties") hereby stipulate as follows:

26 1. The Anthem Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint and  
 27 Memorandum of Points and Authorities in Support ("Motion to Dismiss") in this action was filed on  
 28 February 29, 2024 (ECF No. 37).

**BAILEY♦KENNEDY**  
 8984 SPANISH RIDGE AVENUE  
 LAS VEGAS, NEVADA 89148-1302  
 702.562.8820

1       2.     The Hospitals' current deadline to respond to the Motion to Dismiss is March 28,  
2 2024.

3       3.     Due to the schedules of the Hospitals and their counsel, the Hospitals require  
4 additional time to prepare their response to the Motion to Dismiss.

5       4.     The Parties therefore stipulate and agree to extend the deadline for the Hospitals to  
6 file their response to the Motion to Dismiss to April 11, 2024.

7       5.     This is the Hospitals' second requested extension. This stipulation is made in good  
8 faith and not to delay the proceedings.

9       Dated this 25th day of March, 2024.

10      Dated this 25th day of March, 2024.

11      **BAILEY♦KENNEDY**

12     By: /s/ Joshua M. Dickey

13       JOSHUA M. DICKEY  
14       PAUL C. WILLIAMS  
15       REBECCA L. CROOKER  
16       8984 Spanish Ridge Avenue  
17       Las Vegas, Nevada 89148-1302

18      Attorneys for Plaintiffs

19      **MCDOWELL HETHERINGTON LLP**

20     By: /s/ Charles H. McCrea

21       CHARLES H. MCCREA, ESQ.  
22       **PRHLAW LLC**  
23       520 South Fourth Street, Suite 360  
24       Las Vegas, Nevada 89101

25       JENNIFER H. CHUNG\*  
26       1001 Fannin Street, Suite 2400  
27       Houston, Texas 77002  
28       \**Pro Hac Vice* petition to be submitted.

29      *Attorneys for Defendants Blue Cross of California  
30       d/b/a Anthem Blue Cross and Anthem Blue Cross  
31       Life and Health Insurance Company*

32      **IT IS SO ORDERED:**

33        
34      \_\_\_\_\_  
35      UNITED STATES DISTRICT JUDGE

36      DATED: April 2, 2024